

Piekarsky & Associates, LLC
191 Godwin Avenue
Wyckoff, New Jersey 07481
Telephone: 201-560-5000
Mark R. Faro, Esq. (016742009)
Counsel for Creditor Angel Santiago

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	Chapter 11
STRIKE FORCE PROTECTIVE SERVICES, INC.	Case No. 18-10156
Debtor.	Hon. John K. Sherwood
	Hearing Date and Time: February 20, 2018 at 10:00 a.m.

NOTICE OF MOTION FOR AN ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY TO PROCEED WITH SOUTHERN DISTRICT OF NEW YORK ACTION CONCERNING PERSONAL INJURY CLAIMS ONLY TO THE EXTENT OF ANY APPLICABLE INSURANCE.

PLEASE TAKE NOTICE that on February 20, 2018 at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, as counsel for Angel Santiago shall move before the HONORABLE JOHN K. SHERWOOD, United States Bankruptcy Judge, Courtroom 3D, 50 Walnut Street, Newark, Jersey, for the entry of an Order for relief from the automatic stay pursuant to 11 U.S.C. §362(d) so as to allow the parties to continue with a Southern District of New York action concerning personal injury claims to the extent of any applicable insurance and for such other further relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE that, in the event timely objections are not filed with the Court and served upon the undersigned counsel as provided in D.N.J. L.B.R.9013-1(a) and (f), the relief requested shall be deemed uncontested and the Court may, in its discretion, grant the requested relief.

PLEASE TAKE FURTHER NOTICE that any answering papers or objections to the Creditor's motion must be filed and served at least seven (7) days before the return date of this motion. If you wish to object to this motion, you must file responding papers stating with particularity the basis of your objection to the motion. All such responsive papers must be filed with the Clerk of the Bankruptcy Court for the District of New Jersey, located at 50 Walnut Street, Newark, New Jersey, and served simultaneously upon, Mark R. Faro, Esq., as counsel for the Creditor, at 191 Godwin Avenue, Wyckoff, New Jersey; and

PLEASE TAKE FURTHER NOTICE that oral argument is only requested if the motion is contested or so directed by the Court.

PIEKARSKY & ASSOCIATES, LLC
Counsel for Angel Santiago

Dated: January 31, 2018

/s/ Mark R. Faro
Mark R. Faro, Esq.